

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Lisa Michelle Ceasar

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**-against-**

SC Department of Health and Environmental  
Control

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**Complaint for Employment  
Discrimination**

Case No. \_\_\_\_\_  
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☒ No  
(check one)

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**I. The Parties to This Complaint**

**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Lisa M. Ceasar</u>
Street Address	<u>129 Jones Creek</u>
City and County	<u>Anderson SC Anderson County</u>
State and Zip Code	<u>South Carolina 29621</u>
Telephone Number	<u>864-328-3175</u>

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name

SC Department of Health and Environmental Control

Job or Title

(if known)

Street Address

2600 Bull Street

City and County

Columbia Richland County

State and Zip Code

South Carolina 29201

Telephone Number

803-898-3300

## Defendant No. 2

Name

Job or Title

(if known)

Street Address

City and County

State and Zip Code

Telephone Number

## Defendant No. 3

Name

Job or Title

(if known)

Street Address

City and County

State and Zip Code

Telephone Number

## Defendant No. 4

Name

Job or Title

(if known)

Street Address \_\_\_\_\_

City and County \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

**C. Place of Employment**

The address at which I sought employment or was employed by the defendant(s) is:

Name

SC Department of Health and Env. Control

Street Address

8231 Parklane Road

City and County

Columbia Richland County

State and Zip Code

South Carolina 29223

Telephone Number

803-896-0848**II. Basis for Jurisdiction**

This action is brought for discrimination in employment pursuant to (check all that apply):

- ☒ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

*(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

- ☐ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

*(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)*

- ☐ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

*(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

- ☐ Other federal law (specify the federal law):

☒ Relevant state law (specify, if known):

☒ Relevant city or county law (specify, if known):

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes (*check all that apply*):

- ☐ Failure to hire me.
- ☐ Termination of my employment.
- ☐ Failure to promote me.
- ☐ Failure to accommodate my disability.
- ☐ Unequal terms and conditions of my employment.
- ☒ Retaliation.

☒ Other acts (specify): Defamation of character  
Sexual harassment

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)

September 2013 to continuing Action

C. I believe that defendant(s) (*check one*):

- ☒ is/are still committing these acts against me.
- ☐ is/are not still committing these acts against me.

### III. STATEMENT OF CLAIM

I have been subjected to intimidation, sexual harassment, and defamation of character conditions from September 2013 through on or about December 16, 2017 and continuing.

I have been repetitively subjected to a hostile work environment and harassment by a male employee (Mr. Don Stanley) since I reported his inappropriate comments in September 2013. Human Resources and management failed to neutralize the situation nor did they provide any preventive or corrective action other than a three hour sexual harassment class. Mr. Stanley continued to antagonized me consistently even after I spoke with management. A couple of employees even commented on his inappropriate behavior.

Since my complaints, I have been treated less favorably by management than other employees and even one of the senior chemist, Ms. Connie Gibson, began to engage in stalking tactics against me. There was excessive monitoring by Ms. Gibson which was also noted by other employees.

My requests to be transferred were denied yet a previously employee (male) was transferred from the lab for similar circumstances.

Management and Human Resources are responsible for several male employees in the Hayne building who passed around illicit pictures of me and they violated my privacy rights. I am and was humiliated, ridicule, mocked, and belittled. Management retaliated against me and was determine to defamed my character. They have now tried to "cover up" this despicable crime these employees did to me. Several employees (witnesses) in the Hayne building approached me and apologized for what management did and let happen to me. Before I resigned, I was shunned.

As a result, I am suffering from their abusive attitude towards me. My health suffers due to anxiety attacks, high blood pressure, stress, muscle cramps, depression, and social problems. Also due to management negligence, I had to move away from my home because I feared for my life. This retaliation incurred from work overlapped into my private life.

D. Defendant(s) discriminated against me based on my *(check all that apply and explain)*:

- ☐ race \_\_\_\_\_
- ☐ color \_\_\_\_\_
- ☒ gender/sex harassment and retaliation
- ☐ religion \_\_\_\_\_
- ☐ national origin \_\_\_\_\_
- ☐ age. My year of birth is \_\_\_\_\_. *(Give your year of birth only if you are asserting a claim of age discrimination.)*
- ☐ disability or perceived disability *(specify disability)*
- \_\_\_\_\_

E. The facts of my case are as follows. Attach additional pages if needed.

\* See attached sheets (3)

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

*(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)*

#### IV. Exhaustion of Federal Administrative Remedies

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

February 18, 2016

B. The Equal Employment Opportunity Commission *(check one)*:

- ☐ has not issued a Notice of Right to Sue letter.
- ☒ issued a Notice of Right to Sue letter, which I received on *(date)*

May 16, 2017

## E. FACTS

In August 2013, Mr. Don Stanley approached me and said some inappropriate comments to me. I reported it to my supervisor, Mr. David Dale, and asked to be transferred and he reported it to human resources. Within this time frame, I spoke with Tracy Huston and Georgette Lee and explain what happened. Again, I asked them to be transferred from the labs.

I called Tracy Huston on October 4, 2013 to let her know I was under excessive work stress. I received a letter from human resources on November 4, 2013 explaining the case was closed. I was not transferred and I was told there was no place for me to go. I responded to Tracy because there was incorrect information in the letter. After the case was closed, the harassment began towards me by Mr. Don Stanley.

Mr. Don Stanley (office room #314) would come in room 329 (my workstation) and sit directly in front of me to intimidate. It was a subtle type of bullying because management passed by room 329 constantly and never addressed the issue as we were the only ones in room 329 and Don is best friends with Michael Mattocks (Division Director). Mr. Stanley would stare at me constantly. This behavior occurred **daily**. He would constantly walk in and walk pass my desk and walk out; granted there was no reason for him to be there. He would come in the room with his hands in his pockets and just stand in my view.

Judy Graham reported to me as she walked into room 329, Mr. Stanley was sitting at the desk directly in front of my workstation and she saw him just sitting and drawing on piece of paper and she noted he would watch each time the door opens.

Efram Parlor would began to laugh when Don would walk in the room with his tactics to harass me in a subtle way. There were several other employees made comments about his behavior - Michael Shirley, Karen Asmond and Cheryl (BOL).

I was alone in room 329 at my workstation, someone walks in, about five minutes later, I quickly turned around in my seat and ran into Mr. Stanley. He was standing directly behind me in a threatening manner. He could have done anything to me. I reported it to Sandra Flemming (Assistant Bureau Chief) in January 2016 but management failed to address my complaints.

Don would come in room 329 at 0730 am and talk with Connie Gibson ( her desk was directly in front of my) about his personal life and stare. This behavior was very intimidating. There was no consequences to his behavior. Management failed to prevent his harassment. Prior to his initial inappropriate comments in August 2013, he did not portray this behavior.

I sent an email to David Dale (Supervisor) and Michael Mattocks (Division Director) asking why is Don constantly in room 329 without just reason. To this very day, neither responded to my email. Again management failed to address my complaints and prevent any other harassment from taking place. The same letter was forward to HR, and I spoke with Georgette Lee and Tracy Huston on or about February 26, 2014. Again, they listen and did nothing about the harassment.

I applied to state jobs as well as jobs in the private sector. Some I interviewed and was rejected for these positions. Some I was well qualified and I became suspicious. I applied for a Chemist III position in the Bureau of Labs on or about February 2014 and was offered a demotion position by Evelyn Edwards. I applied for a position in Lab Certification (May 2015) and was offered an opportunity to work part time and Sandra Flemming approved but David Dale (supervisor) denied for me to remove myself from the hostile environment I encountered daily to



work part time in a different location. Again management failed to prevent harassment from taking place.

On or about October 2014, Connie Gibson began to stalk me at work. She began to follow me with excessive monitoring on a daily basis. Karen Asmond noted the behavior to me. Karen said to me "Why is Connie following you everywhere you go?" Other employees (BOL) that came in the break room also noted her behavior towards me. This behavior occurred daily. As soon as I came to work, she monitored me.

In January 2016, I spoke with Sandra Fleming about my concerns: there was an open position in metals and asked if I could go in that position. I was told there was someone else most likely will get the position. I let Sandra know I emailed the supervision (David Dale) and never received a reply to this day. I asked "who gave Connie Gibson permission to follow me"? Sandra replied she doesn't think anyone would do anything like that. Also I asked, "why am I treated differently than other employees?"

I was placed in disadvantage working conditions. My health suffered. I was afraid for my life. I stopped putting my lunch in the refrigerator. I put my personal lock on my locker. I suffered from work related stress, muscle cramps, HBP, tension, sleeplessness, which led to my doctor recommended me to go to a therapist because I was having anxiety attacks and I was having trouble driving across any type of bridge. Everything that happened at work transferred to my private life.

On or about February 2016, several employees walked up to me and apologized for what management did to me. At the time, I believed it was management blocking me from jobs but I realized it was something else. At this point I knew it had something to do with pictures of me because I heard whispers "did you see it".

Michael Shirley apologized for what happened to me. I saw him with Misty Kennedy and Michael said he can show her where to find it. Misty then replied "I don't see anything" and Michael replied "she keeps her house dark". At this point I kept the curtains closed and my house was kept dark.

Cheryl Boone approached me in the bathroom at DHEC and she apologized for what management did and she was angry that Michael Mattocks (Division director) and David Dale (supervision) would do such a thing.

I asked Efrem Parlor what was going on and he replied "I didn't do it, it wasn't me, I had nothing to do with it". At another time, I asked Efrem "where was the pictures?" and he replied "I want tell them upstairs (management) you said anything" and he immediately got on the elevator.

Several other employees came to me and apologized for what happened. Approximately 80% of the employees in the Hayne building knew what management did to retaliate against me. I was kept in the dark. Management had everyone to shun me. Management set out to humiliate and destroy me as a person. I saw Sandra Flemming confront Michael Mattocks in her office but yet it seems management is trying to "cover up" what the male employees did to me.

This situation spill into my home life. Men would stopped in front of my home and take pictures. While at Drew's Gym, a male yelled "I see someone I know, I see all of someone". I was approached on three different occasions by teenage boys. On one occasion, I was pointed out "Is that her"? Another occasion, two boys followed me in the store and kept saying "you ask her"



Brenda Jenkins Fraiser said to me " I told Don Stanley to apologize for what he did to you".

David Dale (supervisor) said to me: "you need to stop sitting on your couch every weekend and come out sometime to Saluda park" and another incident: " you are eating too much junk food"; it was like he was watching me in my house. Mr. Don Stanley would walk pass me and repeat things that I said in my house while I am alone. So no one should have knowledge of what I said or did in my home. These people monitored me in my home.

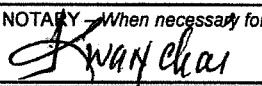
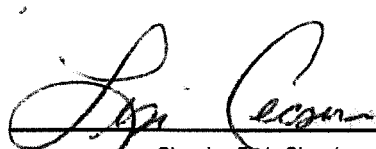
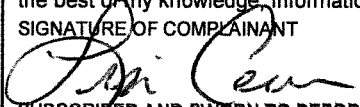
I asked on numerous occasions to be transferred yet Michael Mattocks were transferred in July 2016 to the Air section with little to no knowledge of that area.

On December 16, 2016, I spoke to Marvin Tyler and asked him "there are pictures and management know about it" and Marvin shook his head in a up and down motion which I took for a yes.

I have been laughed at, ridicule, humiliated, and mocked. I experience psychological abuse because management refused to address the issues of abuse by these employees (male). These are not the only incidents because I cannot write them all.

I resigned from my position on December 16, 2016 through constructive discharge. Management made the work environment unbearable for me to continue to work. I got a job at Department of Transportation but the situation I was in, spilled over into DOT. My last work day was July 19, 2017 with the State of South Carolina.

EEOC Form 5 (11/09)

<b>CHARGE OF DISCRIMINATION</b> <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To: Agency(ies) Charge No(s): <input checked="" type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC <b>14C-2016-00405</b>	
<b>South Carolina Human Affairs Commission</b> and EEOC <small>State or local Agency, if any</small>			
Name (indicate Mr., Ms., Mrs.) <b>Ms. Lisa M. Ceasar</b>		Home Phone (Incl. Area Code) <b>(803) 587-3269</b>	Date of Birth <b>12-30-1963</b>
Street Address City, State and ZIP Code <b>100 Gabriel Street, Columbia, SC 29203</b>			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name <b>SC DEPARTMENT OF HEALTH &amp; ENVIRONMENTAL CONTROL</b>		No. Employees, Members <b>500 or More</b>	Phone No. (Include Area Code) <b>(803) 898-3300</b>
Street Address City, State and ZIP Code <b>2600 Bull Street, Columbia, SC 29201</b>			
Name		No. Employees, Members	Phone No. (Include Area Code)
Street Address City, State and ZIP Code			
DISCRIMINATION BASED ON (Check appropriate box(es).) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest <b>09-01-2013 04-27-2016</b>  <input checked="" type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): <p>I have been subjected to intimidation and disparate terms and conditions from on or about September 1, 2013, through on or about April 27, 2016, and continuing. I have been subjected to a hostile work environment by a male employee since I reported his suggestive, inappropriate comments. He persists in coming into my work area, where I am the sole employee, and stands in close proximity to me in an intimidating and threatening manner, without any real reason for being in the area. I reported his behavior to management and Human Resources, but no corrective action has been taken. Since my complaints, I have been treated less favorably by management than other employees, subjected to excessive supervision, and my requests to transfer to another section have been denied. I am aware that other employees (male) have been transferred to different sections for various reasons. I also applied for two separate positions in the agency but I received neither, and I believe I am being blocked from transferring in retaliation for my complaints.</p> <p>Therefore, I believe I have been subjected to discrimination based on my sex (female) and in retaliation for my opposition to employment practices declared unlawful by the SC Human Affairs Law, as amended, and Title VII of the US Civil Rights Act of 1964, as amended.</p>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements  <b>Kwan Chai</b> My Comm. No. <b>123456789</b> State of <b>South Carolina</b> My Comm. Exp. Date <b>August 24, 2025</b>	
I declare under penalty of perjury that the above is true and correct.  <div style="display: flex; align-items: center;"> <div style="margin-right: 20px;"> <b>5/10/16</b>            Date         </div> <div>             Charging Party Signature         </div> </div>		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT  SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year) <b>5/10/14</b>	

EEOC Form 161 (11/16)

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

## DISMISSAL AND NOTICE OF RIGHTS

To: **Lisa M. Ceasar**  
**100 Gabriel Street**  
**Columbia, SC 29203**

From: **Charlotte District Office**  
**129 W. Trade Street**  
**Suite 400**  
**Charlotte, NC 28202**



On behalf of person(s) aggrieved whose identity is  
**CONFIDENTIAL (29 CFR §1601.7(a))**

EEOC Charge No.

EEOC Representative

Telephone No.

**14C-2016-00405**

**Renee E. Grube,**  
**State & Local Program Manager**

**(704) 954-6446****THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:**

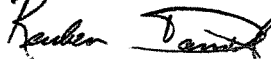
- ☐ The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
- ☐ Your allegations did not involve a disability as defined by the Americans With Disabilities Act.
- ☐ The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
- ☐ Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge
- ☐ The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
- ☒ The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
- ☐ Other (briefly state)

**- NOTICE OF SUIT RIGHTS -***(See the additional information attached to this form.)*

**Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act:** This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission


**May 16, 2017**

Enclosures(s)

**Reuben Daniels, Jr.,**  
**Director**

*(Date Mailed)*

cc:

**Gloria Tyler**  
**Interim Director**  
**SC DEPARTMENT OF HEALTH & ENVIRONMENTAL**  
**CONTROL**  
**2600 Bull Street**  
**Columbia, SC 29201**

*(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)*

C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (*check one*):

- ☐ 60 days or more have elapsed.  
☐ less than 60 days have elapsed.

## V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

- 10 million dollars For each claim @ pain and suffering and <sup>5 million for</sup> defamation of character and humiliation • Value of my home valued located at 100 GABRIEL STREET Columbia SC • 42,000/yr salary until retirement • Health Insurance coverage • Attorney Fees of \$3600<sup>10 EEOC</sup> and Any\*all Future Attorney Fees incur For This claim, court costs and fees.

## VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: July 31, 2017.

Signature of Plaintiff

Printed Name of Plaintiff

Lisa M. Caesar  
Lisa m. Caesar

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address